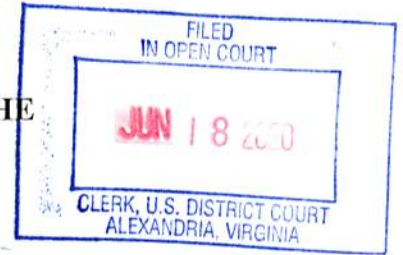


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA	)	Criminal No. 1:20-CR-135
	)	
v.	)	<u>Counts 1-2</u> : 18 U.S.C. § 2251(a) & (e)
	)	Production of Child Pornography
ABEL AMBROCIO,	)	
	)	<u>Count 3</u> : 18 U.S.C. § 2252(a)(2) & (b)(1)
<i>Defendant.</i>	)	Distribution of Child Pornography
	)	
	)	<u>Count 4</u> : 18 U.S.C. § 2252(a)(2) & (b)(1)
	)	Receipt of Child Pornography
	)	
	)	<u>Forfeiture Notice</u> : 18 U.S.C. § 2253(a)

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**INDICTMENT**

June 2020 Term—at Alexandria, Virginia

**COUNT ONE**  
**(Production of Child Pornography)**

THE GRAND JURY CHARGES THAT:

From at least in or about October 2018 to in or about February 2019, within the Eastern District of Virginia, the defendant, ABEL AMBROCIO, attempted to and did employ, use, persuade, induce, entice, and coerce a minor, MINOR VICTIM 1, to engage in, and have MINOR VICTIM 1 assist any other person to engage in, sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which

visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a) and (e).)

**COUNT TWO**  
**(Production of Child Pornography)**

THE GRAND JURY FURTHER CHARGES THAT:

From at least in or about October 2018 to in or about February 2019, within the Eastern District of Virginia, the defendant, ABEL AMBROCIO, attempted to and did employ, use, persuade, induce, entice, and coerce a minor, MINOR VICTIM 2, to engage in, and have MINOR VICTIM 2 assist any other person to engage in, sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a) and (e).)

**COUNT THREE**  
**(Distribution of Child Pornography)**

THE GRAND JURY FURTHER CHARGES THAT:

In or about March 2019, within the Eastern District of Virginia, the defendant, ABEL AMBROCIO, did knowingly distribute a visual depiction using any means and facility of interstate and foreign commerce and that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means, including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct, to wit: digital visual depictions of MINOR VICTIM 1 engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).)

**COUNT FOUR**  
**(Receipt of Child Pornography)**

THE GRAND JURY FURTHER CHARGES THAT:

From at least in or about October 2018 to in or about February 2019, within the Eastern District of Virginia, the defendant, ABEL AMBROCIO, attempted to and did knowingly receive a visual depiction using any means and facility of interstate and foreign commerce and that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means, including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct, to wit: digital visual depictions of MINOR VICTIM 1 and MINOR VICTIM 2 engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).)

**FORFEITURE NOTICE**

THE GRAND JURY HEREBY FINDS THAT:

The defendant, ABEL AMBROCIO, upon conviction on any Count of this Indictment, and as part of the defendant's sentencing under Federal Rule of Criminal Procedure 32.2, shall forfeit to the United States any and all matters that contain visual depictions of minors engaged in sexually explicit conduct in violation of the charged offenses; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real or personal, used or intended to be used to commit or promote the commission of such offenses or property traceable to such property.

If property subject to forfeiture is not available, the government may seek an order forfeiting substitute assets.

(In accordance with Title 18, United States Code, Section 2253(a).)

A TRUE BILL

Pursuant to the E-Government Act,  
The original of this page has been filed  
under seal in the Clerk's Office

\_\_\_\_\_  
FOREPERSON

G. Zachary Terwilliger  
United States Attorney

By:



William G. Clayman  
Special Assistant United States Attorney (LT)